

UNITED STATES DISTRICT COURT

for the

District of Columbia

United States of America

v.

JOHN M. CAMERON

DOB: XXXXXX

Case: 1:21-mj-00690

Assigned to: Judge Meriweather, Robin M.

Assign Date: 12/10/2021

Description: COMPLAINT W/ ARREST WARRANT

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 6, 2021 in the county of _____ in the
 _____ in the District of Columbia, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 1752(a)(1)- Entering and Remaining in a Restricted Building or Grounds,
 18 U.S.C. § 1752(a)(2)- Disorderly and Disruptive Conduct in a Restricted Building or Grounds,
 40 U.S.C. § 5104(e)(2)(D)- Disorderly Conduct in a Capitol Building,
 40 U.S.C. § 5104(e)(2)(G)- Parading, Demonstrating, or Picketing in a Capitol Building.

This criminal complaint is based on these facts:

See attached statement of facts.

☒ Continued on the attached sheet.

Complainant's signature

Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1
 by telephone.

Date: 12/10/2021


2021.12.10

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*Judge's signature*City and state: Washington, D.C.

Robin M. Meriweather, U.S. Magistrate Judge

Printed name and title

STATEMENT OF FACTS

Your affiant is a Special Agent with the Federal Protective Service ("FPS") assigned to the Federal Bureau of Investigations ("FBI") Joint Terrorism Task Force ("JTTF"), Seattle Division, in Tacoma, Washington. In my duties as a special agent and task force officer, I work with a team of federal, state, and local law enforcement agents and officers on investigations relating to domestic and international terrorism. As a result of my training and experience, I am familiar with tactics, methods, and techniques used by terrorist organizations and their members, and by individuals seeking to join or engage in acts on behalf of terrorist organizations. Currently, among other duties, I am tasked with investigating criminal activity in and around the Capitol grounds on January 6, 2021. As an FPS Special Agent, I am authorized by law or by a Government agency to engage in or supervise the prevention, detection, investigation, or prosecution of a violation of Federal criminal laws.

The U.S. Capitol is secured 24 hours a day by U.S. Capitol Police. Restrictions around the U.S. Capitol include permanent and temporary security barriers and posts manned by U.S. Capitol Police. Only authorized people with appropriate identification are allowed access inside the U.S. Capitol. On January 6, 2021, the exterior plaza of the U.S. Capitol was also closed to members of the public.

On January 6, 2021, a joint session of the United States Congress convened at the Capitol, which is located at First Street, SE, in Washington, D.C. During the joint session, elected members of the United States House of Representatives and the United States Senate were meeting in separate chambers of the Capitol to certify the vote count of the Electoral College of the 2020 Presidential Election, which had taken place on November 3, 2020. The joint session began at approximately 1:00 p.m. Shortly thereafter, by approximately 1:30 p.m., the House and Senate adjourned to separate chambers to resolve a particular objection. Vice President Mike Pence was present and presiding, first in the joint session, and then in the Senate chamber.

As the proceedings continued in both the House and the Senate, and with Vice President Mike Pence present and presiding over the Senate, a large crowd gathered outside the Capitol. Temporary and permanent barricades were in place around the exterior of the Capitol building, and U.S. Capitol Police were present and attempting to keep the crowd away from the Capitol building and the proceedings underway inside.

At such time, the certification proceedings were still underway and the exterior doors and windows of the U.S. Capitol were locked or otherwise secured. Members of the U.S. Capitol Police attempted to maintain order and keep the crowd from entering the Capitol; however, around 2:00 p.m., individuals in the crowd forced entry into the U.S. Capitol, including by breaking windows and by assaulting members of the U.S. Capitol Police, as others in the crowd encouraged and assisted those acts.

Shortly thereafter, at approximately 2:20 p.m., members of the House of Representatives and Senate, including the President of the Senate, Vice President Mike Pence, were instructed to—and did—evacuate the chambers. Accordingly, the joint session of the Congress was effectively suspended until shortly after 8:00 p.m. Vice President Pence remained in the Capitol from the time

he was evacuated from the Senate Chamber until the sessions resumed.

During national news coverage of the aforementioned events, video footage which appeared to be captured on mobile devices of persons present on the scene, on Body Worn Cameras (BWC) of law enforcement officers of the Washington, D.C. Metro Police Department (MPD), and on CCTV cameras throughout the Capitol building, depicted evidence of violations of local and federal law, including scores of individuals inside the U.S. Capitol building without authority to be there.

Surveillance footage from CCTVs taken on January 6, 2021, showed a middle-aged man wearing a red baseball cap with white "Make America Great Again" lettering, a black hooded sweatshirt covered by a white t-shirt bearing the words "COUNT ALL LEGAL VOTES," a green vest, backpack, and an American flag cape entered the U.S. Capitol through the Senate Wing Door on the west side at approximately 2:20 pm, less than 10 minutes after rioters first breached the U.S. Capitol building through that same door, as shown in Figure 1. He made his way to the Crypt, as shown in Figure 2, then toward the Memorial Door on the east side of the building. Video shows him leaving the Capitol by climbing through a broken window near the Senate Wing Door at approximately 2:42 pm.



Figure 1



Figure 2

On or about January 8, 2021, the FBI received a tip indicating that JOHN M. CAMERON of Port Orchard, Washington, had been at the U.S. Capitol on January 6, 2021. The tipster provided a link to CAMERON's Facebook account, which is listed in his own name, on which the user had uploaded commentary and pictures documenting his trip to Washington, D.C. on January 6, 2021. I reviewed CAMERON's Facebook account and located several posts and pictures about his plans to travel to Washington D.C. for the "Stop the Steal" rally and his participation in the riot that day.

CAMERON's publicly-accessible Facebook page shows that on the morning of January 6, 2021, he posted photos of himself in the same attire as the individual described above seen on CCTV footage inside the U.S. Capitol, as shown in Figure 3, "layer[ing] up" for a day outdoors.



Figure 3

CAMERON posted other photos and videos to the same Facebook account that day, including pictures of himself and the crowd at the riot on the restricted grounds of the U.S. Capitol. One such video included the caption, “Civil disobedience[,]” in which rioters can be seen breaching the secured areas of the scaffolding surrounding the Capitol building. In another video, the crowd surrounding CAMERON can be heard chanting, “Let us in! Let us in!” outside the Capitol building. CAMERON posted a video of himself in what appears to be a D.C. Metro train station after leaving the Capitol, in which he described the events while pointing the camera at himself, as shown in Figure 4. He is identifiable in the video and is wearing the same attire described above, including the American flag cape. In his comments, he said of his experience at the U.S. Capitol: “Was it pretty? No. Did it make a statement? Yes.” He said he didn’t know who had broken the doors down at the Capitol building. He also said it was a fun, exciting, interesting, and historic event.

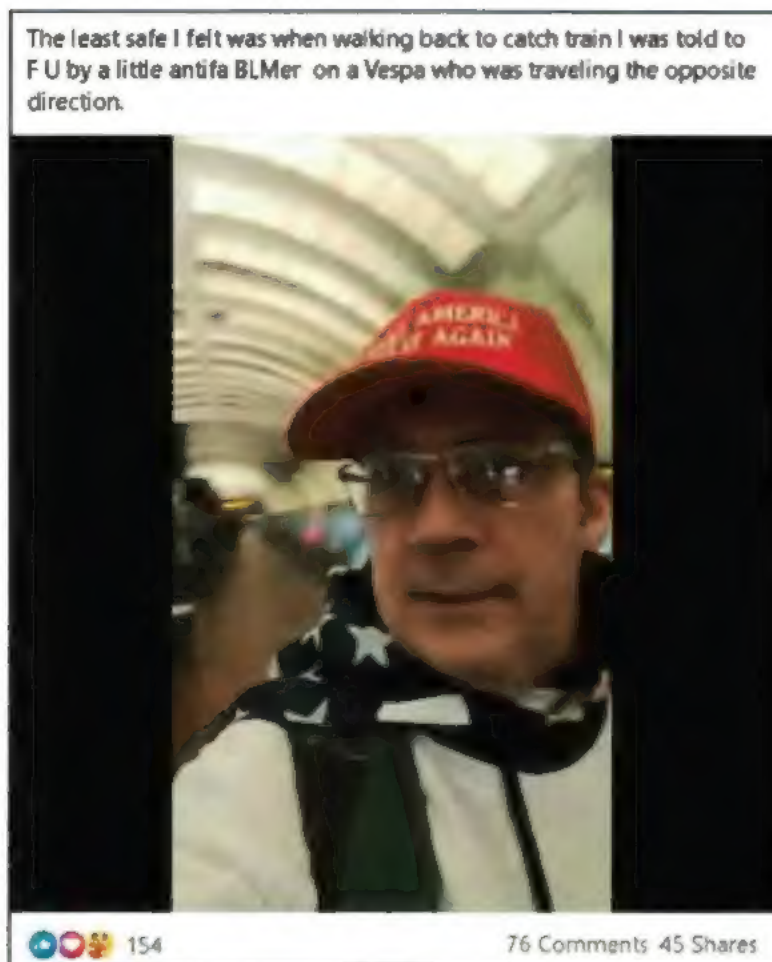


Figure 4

According to records obtained through a search warrant served on Google, a mobile device associated with the email address johnXXXXX@gmail.com, was present at the U.S. Capitol on January 6, 2021. Google records indicate that the account is owned by JOHN CAMERON and the recovery phone number listed for this email address is (XXX) XXX-0200. AT&T cell phone records confirm that this phone number belongs to JOHN CAMERON of Port Orchard, Washington.

Google location data, taking the “maps display radius” into account,¹ suggests that CAMERON was on Capitol grounds and inside of the Capitol building between 2:09 p.m. and

¹ Google estimates device location using sources including GPS data and information about nearby Wi-Fi access points and Bluetooth beacons. This location data varies in its accuracy, depending on the source(s) of the data. As a result, Google assigns a “maps display radius” for each location data point. Thus, where Google estimates that its location data is accurate to within 10 meters, Google assigns a “maps display radius” of 10 meters to the location data point. Finally, Google reports that its “maps display radius” reflects the actual location of the covered device approximately 68% of the time.

3:51 p.m., as shown in Figure 5. It appears, based on this, that CAMERON remained on the restricted grounds of the Capitol for some time after he left the building.

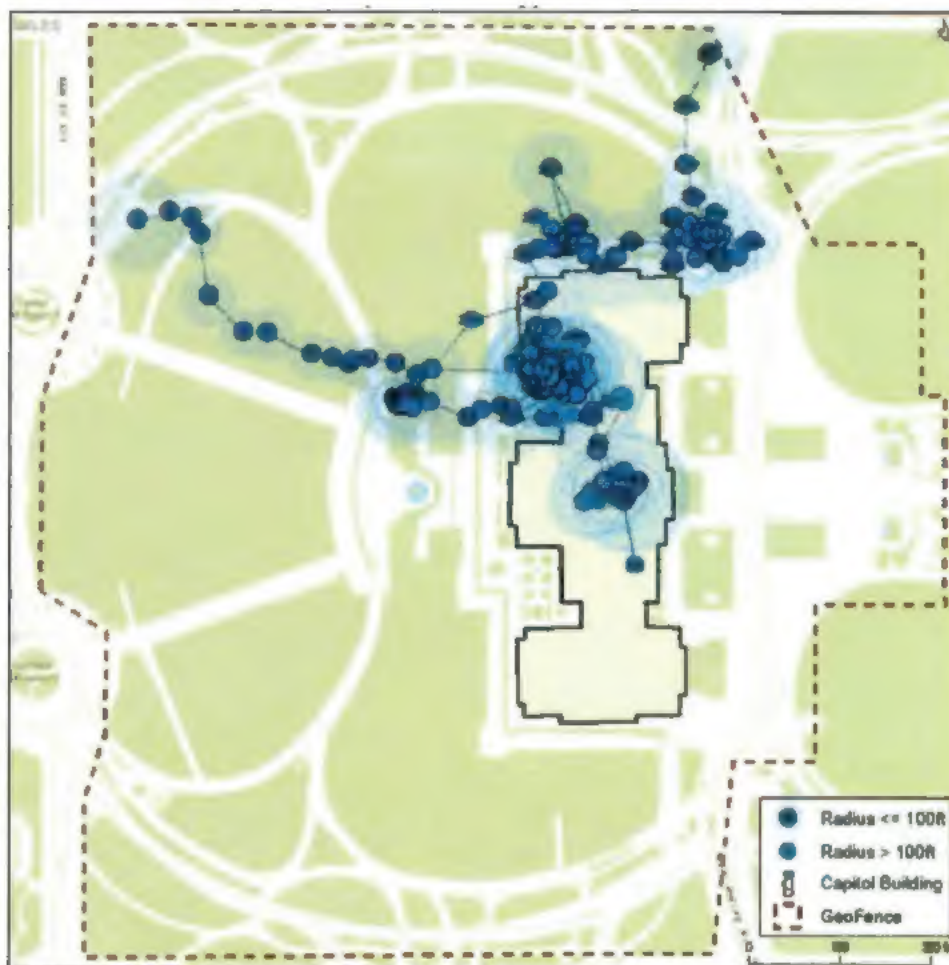


Figure 5

Based on my review of the video footage from CCTV cameras, in comparison with videos and photos CAMERON posted of himself on his Facebook page, along with Google location records, I believe the individual shown entering the U.S. Capitol building in Figure 1 and walking through the Crypt in Figure 2 is JOHN M. CAMERON. This belief is further corroborated by an interview I conducted with a distant relative of CAMERON's who was also Facebook friends with CAMERON at the time of the riot. On around October 13, 2021, this individual identified CAMERON as the individual in the photo taken on the morning of January 6, 2021, shown in Figure 3. He/she also reviewed screenshots of U.S. Capitol security footage and identified CAMERON as the individual entering the building through the Senate Wing Doors, shown in Figure 1. (He/she could not confirm the identity of the same individual in some of the other CCTV footage, which are of grainier quality.)

Based on the foregoing, your affiant submits that there is probable cause to believe that CAMERON violated 18 U.S.C. § 1752(a)(1) and (2), which makes it a crime to (1) knowingly

enter or remain in any restricted building or grounds without lawful authority to do; and (2) knowingly, and with intent to impede or disrupt the orderly conduct of Government business or official functions, engage in disorderly or disruptive conduct in, or within such proximity to, any restricted building or grounds when, or so that, such conduct, in fact, impedes or disrupts the orderly conduct of Government business or official functions; or attempts or conspires to do so. For purposes of Section 1752 of Title 18, a "restricted building" includes a posted, cordoned off, or otherwise restricted area of a building or grounds where the President or other person protected by the Secret Service, including the Vice President, is or will be temporarily visiting; or any building or grounds so restricted in conjunction with an event designated as a special event of national significance.

Your affiant submits there is also probable cause to believe that CAMERON violated 40 U.S.C. § 5104(e)(2)(D) and (G), which makes it a crime to willfully and knowingly (D) utter loud, threatening, or abusive language, or engage in disorderly or disruptive conduct, at any place in the Grounds or in any of the Capitol Buildings with the intent to impede, disrupt, or disturb the orderly conduct of a session of Congress or either House of Congress, or the orderly conduct in that building of a hearing before, or any deliberations of, a committee of Congress or either House of Congress; and (G) parade, demonstrate, or picket in any of the Capitol Buildings.



Special Agent
Federal Protective Service

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 10th day of December 2021.



Rob M. Meriweather

2021.12.10
15:35:19 -05'00'

ROBIN M. MERIWEATHER
U.S. MAGISTRATE JUDGE